



September 16, 2016

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EX PARTE (CORRECTED)
**PS Docket No. 15-91: *Improving Wireless Emergency Alerts and
Community-Initiated Alerting***

Dear Ms. Dortch:

On August 18, 2016, Nsighttel Wireless, LLC's (d/b/a Cellcom) Director of Network Management Center, Kathleen Whitbeck participated in a conference call with the Federal Communications Commission's ("Commission") Public Safety & Homeland Security Bureau Attorney Advisor James Wiley, along with Rasoul Safavian and Michael Connelly, both with the Commission's Public Safety & Homeland Security Bureau, to discuss the above referenced proceeding. During this call, Cellcom specifically discussed the following:

- **Maximum Character Limit** – While Cellcom agrees with the Commission's approach in expanding the maximum permissible length of Wireless Emergency Alert ("WEA") messages, it encourages the Commission to be mindful of the often limited resources of competitive carriers during such a transition.
- **Public Safety Alerts** – Cellcom supports the Commission's proposal to create an additional class of WEA alerts at this time.
- **Embedded References for Amber Alerts** – Cellcom reiterated that requiring embedded URLs in every alert could result in consumer fatigue and network congestion. For example, consumers using embedded phone numbers for reality television competitions have, in the past, caused severe network congestion and jams. Therefore, Cellcom encourages the Commission to proceed with caution if, and when, it chooses to include URLs and phone numbers in alerts other than Amber Alerts.
- **Supporting Spanish Messaging** – Cellcom agrees that supporting Spanish messages is reasonable and technically feasible at this time.
- **Geotargeting** – While Cellcom understands and appreciates the Commission's goal to narrow the target area of WEA alerts, Cellcom encourages the Commission to be mindful of the timing and development costs that may be associated with converting these geocodes to more granular geospatial areas.

- **WEA Prioritization** – Cellcom highlighted certain performance distinctions between 3G and 4G devices, as well as distinctions between 4G devices themselves. Cellcom asked the Commission to consider compliance calculations that could result from these device distinctions and recommended the Commission only require prioritization compliance on future devices as opposed to legacy models.
- **Incremental Cost of Deployment** – Cellcom indicated that if the FCC allows sufficient time for software updates to be bundled along with other required software updates, then the incremental cost of software deployment is likely to be minimal.
- **Incremental Cost of Deploying Updates** – Cellcom also indicated that the incremental cost of deploying software updates, once those updates are developed and tested, may be shared if bundled with other software modifications for smaller participating CMS providers.

Respectfully submitted,



Larry L. Lueck
Associate Legal Counsel

cc (via email):
James Wiley
Rasoul Safavian
Michael Connelly